

JAP:AS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

15 MJ 623

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(T. 18, U.S.C. § 2252(a)(4)(B))

ALEX SCHREIBER,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

THOMAS THOMPSON, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), duly appointed according to law and acting as such.

On or about July 7, 2015, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ALEX SCHREIBER did knowingly possess 1 or more books, magazines, periodicals, films, video tapes, or other matter which contain any visual depiction, the production of such visual depiction having involved the use of one or more minors engaging in sexually explicit conduct and such visual depiction was of such conduct, that has been mailed, or has been shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, or which was produced using materials which have been mailed or so shipped or transported, by any means including by computer.

(Title 18, United States Code, Section 2252(a)(4)(B)).

The source of your deponent's information and the grounds for his belief are as follows:

1. I have been a Special Agent with the FBI since December 2004 and am currently assigned to the New York Office. Since September 2007, I have been assigned to a Crimes Against Children squad and have investigated violations of criminal law relating to the sexual exploitation of children. I have gained expertise in this area through classroom training and daily work conducting these types of investigations. As a result of my training and experience, I am familiar with the techniques and methods used by individuals involved in criminal activity to conceal their activities from detection by law enforcement authorities. As part of my responsibilities, I have been involved in the investigation of numerous child pornography ("CP") cases and have reviewed thousands of photographs depicting minors (less than eighteen years of age) being sexually exploited by adults. Through my experience in these investigations, I have become familiar with methods of determining whether a child is a minor. I am also a member of the Eastern District of New York Project Safe Childhood Task Force.

2. I am familiar with the information contained in this affidavit based on my own personal participation in the investigation, my review of documents, my training and experience, and discussions I have had with other law enforcement personnel concerning the creation, distribution and proliferation of CP. Additionally, statements attributable to individuals herein are set forth in sum and substance and in part.

3. A website ("Website A") was operated on a network ("the Network") available to Internet users who are aware of its existence. The Network is designed specifically to facilitate anonymous communication over the Internet. Websites that are accessible only to users within the Network can be set up within the Network and Website A was one such website. Website A could not generally be accessed through the traditional Internet. Only a user who had installed the appropriate software on the user's computer could access Website A. Even after connecting to the Network, however, a user had to know the exact web address of Website A in order to access it. Unlike on the traditional Internet, a user could not simply perform a Google search for the name of Website A, obtain the web address for Website A, and click on a link to navigate to Website A. Rather, a user had to have obtained the web address for Website A directly from another source, such as other users of Website A, or from online postings describing both the sort of content available on Website A and its location. Accessing Website A therefore required numerous affirmative steps by the user.

4. Website A was a child pornography bulletin board and website dedicated to the advertisement and distribution of child pornography and the discussion of matters pertinent to the sexual abuse of children, including the safety and security of individuals who seek to sexually exploit children online. On or about February 20, 2015, the computer server hosting Website A was seized from a web-hosting facility in Lenoir, North Carolina. Between February 20, 2015, and March 4, 2015, law enforcement agents acting

pursuant to an order of the United States District Court for the Eastern District of Virginia monitored electronic communications of users of Website A.

5. According to data obtained from logs on Website A and monitoring by law enforcement, a user with the user name "philcic" originally registered an account on Website A on September 3, 2014. Between September 2014 and March 2015, the user "philcic" actively logged into Website A for a total of 194 hours. During this activity, the user "philcic" accessed numerous posts on Website A containing sexually explicit images and videos of prepubescent females. For example, on February 24, 2015, the user "philcic" accessed Website A using the IP address 72.229.152.206 utilizing MAC address: 2C600C1C0F3F, specifically the post entitled "I like fucking (fulllrach_xvid.mp4)" in the section "Pre-teen Videos >> Girls HC". Based upon my training and experience I know that "HC" is a common acronym for "hardcore". Among other things, this post contained the original post by user "Goodname", which contained a downloadable link and accompanied password for a video file "Goodname" described as a "beautiful hardcore video". All pursuant posts appear to describe the video as a "penetration video" that is part of the "Fatterman" or "Fat Man" series of CP videos. As another example, on, March 3, 2015 the user "philcic" accessed a post that contained a link to a series of approximately 400 images that depicted an approximately five year old, prepubescent girl, engaged in various sexual acts, including engaging in oral and vaginal intercourse with an adult male. Some of the photos depict the girl with her hands and legs bound and tied while she performs oral sex on an adult male. At least nine of the photos depict the adult male inserting his finger and other

objects into the girl's anal cavity. During this session, the IP address information for the user "philcic" was not collected.

6. Using publicly available websites, FBI Special Agents were able to determine that the IP Address 72.229.152.206 was operated by the Internet Service Provider ("ISP") Time Warner Cable.

7. Records obtained from Time Warner Cable, in response to a subpoena, showed that the defendant, ALEX SCHREIBER is the subscriber to whom IP address 72.229.152.206 was allocated to on the date "philcic" accessed Website A. The address that Time Warner Cable had associated with SCHREIBER was an apartment in a building located in Little Neck, New York (hereinafter the "Little Neck Address") with an installation date of December 6, 2013.

8. On July 7, 2015, FBI agents executed a search warrant, issued on July 6, 2015 by the Honorable Viktor Pohorelsky at the Little Neck Address.

9. Law enforcement agents discovered ALEX SCHREIBER at the Little Neck Address.


10. Pursuant to the aforementioned search warrant, the agents recovered two external hard drives from the Little Neck Address and discovered that the hard drives contained over 200 files that an initial review indicate are child pornography images and videos. Agents reviewed a number of those files, including:

- a. **03.jpg** is a picture file depicting a nude, prepubescent girl that appears to be approximately nine years old. In the picture, the girl, who appears to be a known CP victim, is lying on a bed with her legs and arms bound with rope and her vagina exposed.

- b. **10.jpg** is a picture file depicting a prepubescent girl that appears to be approximately nine years old with an adult male penis in her mouth. The girl appears to be the same known CP victim as mentioned above.
- c. **cam 6 plys hottttt.mp4** is a video file depicting a prepubescent girl. The video depicts a prepubescent girl that is partially clothed and shows the girl inserting her fingers in her vagina.

11. Upon entering the apartment, agents asked SCHREIBER if he lives alone, which he answered affirmatively. The landlord of the Little Neck Address later confirmed to agents that SCHREIBER does live alone and noted that SCHREIBER does not appear to host guests.

WHEREFORE, your deponent respectfully requests that the defendant ALEX SCHREIBER be dealt with according to law.



THOMAS THOMPSON
Special Agent
Federal Bureau of Investigation

Sworn to before me this
7th day of July, 2015

THE HONORABLE JAMES ORENSTEIN
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK